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5 Attorneys for Defendants
Quanta Storage, Inc. and Quanta Storage
6 America, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE OPTICAL DISK DRIVE PRODUCTS
ANTITRUST LITIGATION

| MDL Docket No. 3:10-md-02143-RS-JCS

This document relates to:

Case No. 3:13-cv-05372-RS

Ingram Micro Inc., et al.,

**STIPULATION AND [PROPOSED]
ORDER REGARDING EXTENSION OF
TIME TO RESPOND TO AMENDED
COMPLAINT AND SERVICE OF
PROCESS**

to V_1

Hon. Richard Seeborg

18 Defendants

[Fed. R. Civ. P. 4 and Civil L.R. 6-1]

STIPULATION

2 WHEREAS on October 25, 2013, Plaintiffs Ingram Micro Inc. (“Ingram Micro”) and
3 Synnex Corporation (“Synnex”) filed a Complaint for Damages and Injunctive Relief [Doc. No.
4 1] (the “Complaint”) naming Quanta Storage, Inc. (“QSI”) and Quanta Storage America, Inc.
5 (“QSA”), among others, as defendants; and

6 WHEREAS on March 26, 2014, Plaintiffs Ingram Micro and Synnex and Defendants QSI
7 and QSA signed a Stipulation and [Proposed] Order Regarding Extension of Time to Respond to
8 Complaint and Service of Process, in which QSI and QSA agreed to waive service of a summons
9 under Rule 4 of the Federal Rules of Civil Procedure and to waive any objections to the absence
10 of service of a summons and the Complaint, and the parties to the stipulation agreed to extend the
11 deadline for QSI and QSA to answer or otherwise respond to the Complaint to Tuesday, June 24,
12 2014, and this Court granted an Order based on that stipulation; and

WHEREAS on April 17, 2014 other defendants in this action, not including QSI and QSA (the “Other Defendants”), filed a Joint Motion to Dismiss the Complaint in this matter; and

15 WHEREAS on April 30, 2014, Plaintiffs Ingram Micro and Synnex and the Other
16 Defendants signed a Stipulation and Proposed Order Continuing Hearing on Defendants' Joint
17 Motion to Dismiss and Extending Time to File First Amended Complaint, which states that (i)
18 "Plaintiffs wish to amend their Complaint," (ii) plaintiffs' deadline to amend the Complaint shall
19 be extended to June 16, 2014, (iii) the Other Defendants' Joint Motion to Dismiss the Complaint
20 shall be withdrawn, and (iv) the Other Defendants shall have forty-five (45) days from the filing
21 of the amended complaint to file a response, and this Court granted an Order based on that
22 stipulation;

23 NOW, THEREFORE, Plaintiffs Ingram Micro and Synnex and Defendants Quanta
24 Storage, Inc., and Defendant Quanta Storage America, Inc., through their respective counsel,
25 hereby stipulate and agree that:

26 1. Defendants Quanta Storage, Inc. and Quanta Storage America, Inc. shall not be
27 required to answer or otherwise respond to the Complaint by June 24, 2014, as stated in the prior
28 stipulation signed by QSI and QSA; and

1 2. In the event that Plaintiffs Ingram Micro Inc. and Synnex Corporation file an
2 amended Complaint by June 16, 2014, Defendants Quanta Storage, Inc. and Quanta Storage
3 America, Inc. shall have forty-five (45) days from the filing of such amended Complaint to
4 respond thereto; and

5 3. In the event that Plaintiffs Ingram Micro and Synnex Corporation fail to file an
6 amended Complaint by June 16, 2014, Defendants Quanta Storage, Inc. and Quanta Storage
7 America, Inc. shall have forty-five (45) days from June 16, 2014 to answer or otherwise respond
8 to the (un-amended) Complaint.

9 IT IS SO STIPULATED.

10 ///

11 ///

12 Dated: June 13 , 2014

CROWELL & MORING LLP

13 By: /S/ Daniel A. Sasse

14 Daniel A. Sasse
15 Angela J. Yu

16 Attorneys for Plaintiffs
17 Ingram Micro Inc. and Synnex Corporation

18 Dated: June 13 , 2014

19 ASIA LAW FOREIGN LEGAL AFFAIRS LAW FIRM

20 By: /S/ Christopher M. Neumeyer

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29 Quanta Storage, Inc. and Quanta Storage America, Inc.

FILER ATTESTATION

Pursuant to Rule 5-1(i)(3) of the Local Rules of Practice in Civil Proceedings Before the United States District Court for the Northern District of California, I, Christopher M. Neumeyer, hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

Dated: June 13, 2014 ASIA LAW FOREIGN LEGAL AFFAIRS LAW FIRM

By: /S/ Christopher M. Neumeyer

Christopher M. Neumeyer

Attorneys for Defendants
Quanta Storage, Inc. and Quanta Storage America, Inc.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 6/13/14

Honorable Richard Seeborg
United States District Judge